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ORIGINAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CYNTHIA FLOWERS,

Defendant.

Case:2:16-cr-20439

Judge: Leitman, Matthew F.

MJ: Grand, David R.

Filed: 06-17-2016 At 10:05 AM

INFO USA v FLOWERS (sk)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

31 U.S.C. § 5324(a)(1) and/or (a)(3)

(Structuring Transactions to Evade Reporting Requirements)

1. From approximately July 2013 until approximately June 2015, in the Eastern District of Michigan, Southern Division, defendant CYNTHIA FLOWERS, for the purpose of evading the reporting requirements of section 5313 or 5325, did cause or attempt to cause a domestic financial institution to fail to file a report required under section 5313 or 5325 or any regulation prescribed under any such section, and/or structured or assisted in structuring or attempted to

structure or assisted in structuring, any transaction with one or more domestic financial institutions.

2. On multiple occasions from August of 2010 through June of 2013, FLOWERS purchased money orders at different U.S. Post Offices (USPO) in the Metro Detroit area using cash totaling \$3,000 or more at a single post office. On those occasions, the U.S. Postal Service (USPS) was required under Title 31 of the United States Code to report the cash transactions to the U.S. Department of Treasury since they involved \$3,000 or more in currency. To fulfill the reporting requirement, the post office completed and filed a Funds Transaction Report (Form 8105-A) with information from the purchaser.
3. FLOWERS's pattern of purchasing USPS money orders changed starting in March of 2013 and continuing through May of 2015. During that time, there were multiple occasions when FLOWERS used \$3,000 or more in cash to purchase money orders within days of one another, or on the same day but at different USPOs to ensure that no one USPO received \$3,000 or more on the same day.
4. In total, FLOWERS purchased 168 money orders totaling \$154,700 during the above period and structured her purchases in the above described manner, which was designed to evade currency transaction reporting requirements.

5. All in violation of Title 31, United States Code, Section 5324(a)(1) and/or
(a)(3).

Barbara L. McQuade
United States Attorney



John K. Neal
Assistant U.S. Attorney
Chief, White Collar Crime Unit



Abed Hammoud
Assistant U.S. Attorney

Dated: June 17, 2016

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United States District Court
Eastern District of Michigan**Criminal Case Cover**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: 

Case Title: USA v. CYNTHIA FLOWERS**County where offense occurred :** Wayne and Oakland Counties**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**☐ Indictment/ ☒ Information --- no prior complaint.☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information****Superseding to Case No:** _____ **Judge:** _____


- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)**

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 17, 2016

Date


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 Assistant United States Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.